

EXHIBIT C

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UMB BANK, NATIONAL ASSOCIATION, AS
TRUSTEE,

Plaintiff,

v.

BLUESTONE COKE, LLC F/K/A ERP
COMPLIANT COKE, LLC,

THOMAS M. CLARKE

and

ANA M. CLARKE,

Defendants.

Case No. _____

AFFIDAVIT OF THOMAS
MATTHEW CLARKE

1. I am Thomas Matthew Clarke. I am a Defendant in the above-captioned matter. I am a resident of the Commonwealth of Virginia and have been at all times relevant to the above-captioned action.

2. I make this affidavit in support of Defendant Bluestone Coke's Notice of Removal, based on my personal knowledge. If called upon to do so, I would testify to the following facts.

3. At the time the above-captioned matter was filed, my wife, Ana Clarke, and I were, and continue to be citizens of Virginia.

4. We reside at 16620 Lee Hwy., Buchanan, VA 24066.

5. We have resided at that location since 2006, and we consider this our permanent residence and our domicile of record.

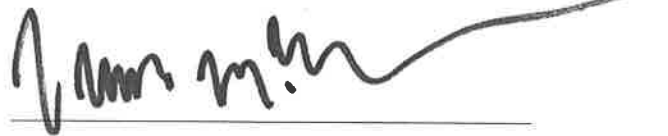
6. It is our present intent to remain Virginia citizens, residing at 16620 Lee Hwy., Buchanan, VA 24066.

7. My wife and I have Virginia driver's licenses.

8. My wife and I pay Virginia state income taxes.

9. My wife and I have business offices located at 192 Summerfield Court, Suite 203, Roanoke, VA 24019.

10. Neither I nor my wife have made any filings in the above captioned civil action.



Thomas Matthew Clarke

Sworn before me this 5 day of March 2020.



Notary Public

County/City of Botetourt
Commonwealth/State of VA
The foregoing instrument was acknowledged
before me this 5 day of Mar
2020 by
Thomas M. Clarke
(name of person seeking acknowledgement)
Jennifer Elaine Bell
Notary Public
My Commission Expires 10/31/20

